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11 | *Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

14 JERRY ALEXANDER, MARTY COHEN,
15 CHARLES DELLE DONNE, RICHARD
16 SCOTT ELDER, ARNIE GETTELSOHN,
17 MARC HARRIS, JERRY HOLLANDER,
18 ELIAS KASSOUF, JEFF MACKINEN,
19 DON MARSHALL, JERRY McDONALD,
20 RON MELANSON, KEN MILES,
MARVIN MILLS, MARC MORIN,
ROBERT PARKER, DENNIS POULSEN,
RON SMITH, ANDREW TANNER,
CRAIG TIEFENTHALER, VIRGINIA
WALLACE, and GERALD WOLFE, on
behalf themselves and all others similarly
situated.

Plaintiffs,

V.

24 DEAN MEILING, MADYLON MEILING,
25 JAMES PROCTOR, JANET CHUBB,
individuals, CHEMEON SURFACE
26 TECHNOLOGY, LLC, METALAST
SURFACE TECHNOLOGY, LLC, D&M-
MI, LLC, DSM PARTNERS, LTD.,
27 MEILING FAMILY PARTNERS, LTD.,
and MERIDIAN ADVANTAGE.

Defendants.

Case No: 3:16-cv-00572-MMD-CLB

**STIPULATION AND [PROPOSED] ORDER
TO EXTEND DUE DATES FOR
PLAINTIFFS' FILING OF RESPONSES TO
DEFENDANTS' BILL OF COST AND
MOTION FOR ATTORNEY FEES**

(First Request)

1 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs JERRY
2 ALEXANDER, MARTY COHEN, CHARLES DELLE DONNE, RICHARD SCOTT ELDER,
3 ARNIE GETTELSON, MARC HARRIS, JERRY HOLLANDER, ELIAS KASSOUF, JEFF
4 MACKINEN, DON MARSHALL, JERRY McDONALD, RON MELANSON, KEN MILES,
5 MARVIN MILLS, MARC MORIN, ROBERT PARKER, DENNIS POULSEN, RON SMITH,
6 ANDREW TANNER, CRAIG TIEFENTHALER, VIRGINIA WALLACE AND GERALD
7 WOLFE (“Plaintiffs”) and Defendants DEAN MEILING, MADYLON MEILING, CHEMEON
8 SURFACE TECHNOLOGY, LLC, METALAST SURFACE TECHNOLOGY, LLC, D&M-MI,
9 LLC, DSM PARTNERS, LTD., AND MEILING FAMILY PARTNERS, LTD. (collectively,
10 “Meiling Defendants”), that the current due dates for Plaintiffs to file Responses to the Meiling
11 Defendants’ Bill of Costs and Motion for Attorney Fees of August 17, 2020 and August 18, 2020,
12 respectively, be extended an additional thirteen (13) and fourteen (14) days respectively, up to and
13 including Tuesday, September 1, 2020. This is the first request to extend either due date.

14 Plaintiffs’ counsel represent that good cause exists to extend these deadlines under LR IA
15 6.1 because counsel for Plaintiffs have mandatory court hearings on August 17 and 18 in cases
16 pending in California and Arizona that cannot be extended, and California counsel is also
17 undergoing Covid testing on August 18, 2020 as the result of recent exposure to the virus that may
18 require a quarantine which will make meeting the deadlines set forth herein very difficult, if not
19 impossible. Plaintiffs’ counsel therefore submit that litigation of this matter will thus be best
served by the proposed extensions.

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1 Accordingly, Plaintiffs respectfully request that the Court grant this stipulated request to
2 continue the due date for filing responses to the Meiling Defendants' Bill of Costs and Motion for
3 Attorney Fees until September 1, 2020.

4 Dated: August 16, 2020

5 /s/ JAMES D. BOYLE

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Technology, LLC, Metalast Surface
Technology, LLC, D&M-MI, LLC, DSM
19 Partners, Ltd., and Meiling Family Partners,
Ltd.

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21 **ORDER**

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23 **IT IS SO ORDERED.**

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26 UNITED STATES DISTRICT JUDGE

27 DATED: August 18, 2020